



Oregon

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February 10, 2006

Kevin Kraus
REACH Community Development, Inc.
1135 SE Salmon
Portland, OR 97214

Re: No Further Action
Lot 1, Station Place (aka Union-Station Horse Barn)
ECSI #2407

Kevin:

DEQ is pleased to conclude that remedial activities have been successfully completed at Lot 1 of the Station Place (aka Union Station-Horse Barn) site located at the northeast corner of NW Lovejoy Street and NW 9th Avenue in Portland, Oregon. Lot 1 is one of seven lots (1 through 5, 7, and 8) comprising the subject site. During investigation work begun in the late 1990s, extensive soil and groundwater contamination was found at the site associated with past railroad activities, and wastes from a manufactured gas plant that operated immediately south of the site in the late 1800s and early 1900s. Contaminants identified in the remedial investigation exceeding risk-based concentrations include metals and polynuclear aromatic hydrocarbons in soil, and benzene in groundwater.

The 2003 Record of Decision (ROD) for the Station Place site required the following:

- Capping of Lots 1 through 5, 7, and 8 with a combination of clean fill and hardscape materials such as asphalt and concrete;
- Installation of a vapor mitigation system below Lots 1 and 2, and periodic monitoring to confirm the effectiveness of the system;
- Periodic groundwater monitoring to confirm that a site-related groundwater plume is not expanding and/or threatening the Willamette River; and
- Placement of institutional controls on all site lots identifying the nature of residual contamination and requiring periodic inspection and maintenance of the cap and vapor mitigation systems.

Remedial activities were complete on Lot 1 concurrent with development of a residential high-rise tower by REACH. Capping materials on Lot 1 consist primarily of hardscape materials including the concrete slab base of the high-rise, and adjacent walkways. A few small landscape areas are capped with two feet of clean fill. The entire site cap outside of the building footprint is underlain by a black woven geotextile fabric, delineating clean capping materials from underlying contaminated soil. The tower slab is underlain by a vapor mitigation system

consisting of a yellow, 15-mil-thick polyethylene vapor barrier and a PVC vapor collection piping system.

A Remedial Action Closure Report documenting the successful implementation of remedial measures was submitted to DEQ in October 2005 and subsequently approved. An Inspection and Maintenance Plan, Soil and Groundwater Management Plan, and Worker Notification and Protection Plan are included in the Remedial Action Work Plan completed for the site in July 2003. Two rounds of periodic air monitoring at Lot 1 required under the Remedial Action Work Plan have been completed to date; an additional year of semi-annual monitoring and three years of annual monitoring remain to be completed. Periodic site-wide groundwater monitoring will be completed by the Portland Development Commission and is not the responsibility of site owner REACH.

As stipulated in the ROD, a deed restriction (Easement and Equitable Servitude or EES) document has been filed with Multnomah County for Lot 1. The EES document was filed on January 26, 2006 and outlines the nature of remaining contamination, cap construction, and responsibilities of the property owner regarding inspection and maintenance of site engineering controls.

DEQ has determined that no further action is required for Lot 1 under Oregon Environmental Cleanup Law, ORS 465.200 et seq. unless additional information becomes available in the future which warrants further investigation. Public notice of DEQ's proposed NFA determination was published in December 1, 2005, and a 30-day comment period provided. No comment was received.

DEQ's no further action (NFA) determination is contingent upon maintenance of the site cap. The EES documents recorded with the property deed explain items including the cap maintenance and reporting requirements, DEQ's right of entry, and DEQ notification requirements in the event that site ownership or zoning/use changes. As outlined in the EES, REACH is responsible for both cap inspection and vapor monitoring work. Note that the first cap inspection should be completed prior to September 1, 2006, and reported to DEQ prior to October 1. Yearly inspection/reporting are required for the foreseeable future unless DEQ determines in its five-year review that less frequent monitoring is necessary. Two events of semi-annual vapor monitoring are to be completed in 2006, followed by annual events in 2007-2009.

We will update DEQ's Environmental Cleanup Site Information (ECSI) database to reflect the NFA decision. Note that the NFA will be identified as conditional as engineering and institutional controls are necessary for the remedy to remain effective. The site will remain on DEQ's Confirmed Release List and Inventory of Hazardous Substance Sites for the same reason.

If you have any questions, please contact Daniel Hafley at 229-5417. Thank you for your participation in the Voluntary Cleanup Program.

Sincerely,

Keith Johnson
Manager, Cleanup & Lower Willamette Section

cc: Dan Hafley, C&LW DEQ
Bruce Allen, PDC
David Obern, PDC
Bob Van Vickle, PDC
Len Farr, AMEC